

# EXHIBIT 29

DOCKET NO: UWY-CV18-6046436-S : SUPERIOR COURT  
ERICA V. LAFFERTY, ET AL : JUDICIAL DISTRICT  
OF WATERBURY  
v. : AT WATERBURY, CONNECTICUT  
ALEX EMRIC JONES, ET AL : SEPTEMBER 15, 2022

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DOCKET NO: UWY-CV18-6046437-S : SUPERIOR COURT  
UWY-CV18-6046438-S :  
WILLIAM SHERLACH : JUDICIAL DISTRICT  
OF WATERBURY  
v. : AT WATERBURY, CONNECTICUT  
ALEX EMRIC JONES : SEPTEMBER 15, 2022

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VOLUME 2 OF 4

WITNESS: BRITTANY PAZ

**BEFORE THE HONORABLE BARBARA N. BELLIS, JUDGE**

A P P E A R A N C E S:

Representing the Plaintiff(s):

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Representing Defendant(s): Free Speech Systems LLC, Infowars  
LLC, Infowars Health LLC, and Prison Planet TV, LLC.

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400 Grand Street  
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1 (RESUMED FROM AFTER THE MORNING RECESS)

2 THE MARSHAL: District of Waterbury is now back  
3 in session.

4 Good morning, Your Honor.

5 THE COURT: Good morning again.

6 Please be seated.

7 ATTY. PATTIS: May I be excused, Judge, to find  
8 my witness?

9 THE COURT: Absolutely.

10 ATTY. PATTIS: Could we approach, Judge?

11 THE COURT: You may.

12 (Begin sidebar)

13 ATTY. PATTIS: I just shot a text. I hung -- I  
14 looked, I checked the hall, and I don't know, so..

15 THE COURT: Could be in the ladies' room.

16 ATTY. PATTIS: Yeah. So, I just didn't want you  
17 to think I was --

18 THE COURT: You don't want to go there.

19 ATTY. PATTIS: -- playing video games here.

20 THE COURT: No, no worries.

21 (Off record discussion between the Court and the  
22 clerk.)

23 THE CLERK: Okay.

24 (The witness resumed the witness stand.)

25 THE COURT: Next time be early.

26 THE WITNESS: I'm sorry.

27 THE COURT: Next time be early.

1 THE WITNESS: I'm sorry. I had to call a case  
2 downstairs.

3 THE COURT: No. No, no, no.

4 THE WITNESS: Sorry.

5 THE COURT: Absolutely not.

6 (The jury was escorted into the courtroom.)

7 THE COURT: Okay. Welcome back, everyone.

8 I'm doing my count to ten -- nine, ten -- there  
9 we go.

10 Counsel, we'll stipulate that the entire panel  
11 is present?

12 ATTY. PATTIS: Yes.

13 ATTY. MATTEI: Yes, Your Honor.

14 THE COURT: Please be seated.

15 And whenever you're ready, Attorney Mattei, you  
16 may continue.

17 BRITTANY PAZ, CONTINUED DIRECT EXAMINATION BY ATTY. MATTEI:

18 Q Ms. Paz, before the break we had been walking through  
19 a series of exhibits in which Tim Fruge, Buckley, Hammond,  
20 Lydia Hernandez, and others are referring to Google  
21 Analytics. Correct?

22 A I do recall those exhibits, yes.

23 Q I'd like you to pull up the front pages, please, of  
24 each of those exhibits.

25 You see them here before you. These are each of the  
26 exhibits we were going through earlier.

27 A Yes.

1 Q Okay. Now, I want to ask you, are you prepared to  
2 say now, having reviewed these, that, in fact, Infowars uses  
3 Google Analytics. Correct?

4 A I can really only say what was conveyed to me in my  
5 conversation. I do understand that these emails show that  
6 they have talked about Google Analytics in the past.

7 THE COURT: Ms. Paz, I'm -- That's a yes or no.  
8 Shall I have him repeat the question?

9 THE WITNESS: I don't -- No, no, I understand  
10 the question. I don't know, is my answer.

11 BY ATTY. MATTEI:

12 Q So, even after having reviewed these, Free Speech  
13 Systems is still telling this jury that it just doesn't know  
14 whether they use Google Analytics?

15 A That's correct.

16 Q Okay.

17 Do you remember this email from Tim Fruge to the  
18 Lending Guy?

19 A I recall our conversation about that, yes.

20 Q No, I asked you whether you remember the email.

21 A Oh, you mean had I seen it before today, or --

22 Q No, twenty minutes ago --

23 A Yes.

24 Q -- when I showed you that email, you remembered that;  
25 yes?

26 A Yes.

27 Q Tim Fruge is sending Google Analytics to a guy who

1 wants to advertise on their website. Correct?

2 A That's what the exhibit says, yes.

3 Q And Tim Fruge is telling him all of the ways in which  
4 Google Analytics tracks their audience so that he can assess  
5 whether he wants to pay the five grand for Facebook, or  
6 whatever. Correct?

7 A That's what the purpose of the email appears to be,  
8 yes.

9 Q So, at least it was important enough to Tim Fruge,  
10 correct, when he was doing business. Yes?

11 ATTY. PATTIS: It's compound, Judge. I don't  
12 understand what's going on.

13 ATTY. MATTEI: I'll withdraw it.

14 BY ATTY. MATTEI:

15 Q When Tim Fruge was trying to sell advertising space,  
16 it was important enough to him to send Google Analytics to  
17 the Lending Guy?

18 ATTY. PATTIS: Objection, Judge: contents of  
19 another mind, important enough to him; the document  
20 speaks for itself.

21 THE COURT: Overruled.

22 BY ATTY. MATTEI:

23 A I can't say why he wrote this email or what he was  
24 thinking.

25 Q Ms. Paz, you're Free Speech Systems. This is your  
26 business director. Free Speech Systems can't say why it's  
27 business director would have sent Google Analytics to a guy

1 who wants to send them advertising money?

2 A I didn't --

3 ATTY. PATTIS: Objection, Judge. Indeed, you  
4 can't.

5 THE COURT: Overruled.

6 BY ATTY. MATTEI:

7 A I can't speak to what's in Mr. Fruge's mind. I  
8 didn't speak to him about this particular email.

9 Q The last date here, Exhibit 128 is September 22,  
10 2014. You'd agree with me?

11 A Yes, I see that.

12 Q And on September 24, 2014, Infowars published an  
13 article, and the title of that article was, FBI Says Nobody  
14 Died at Sandy Hook. Correct -- I'm sorry, FBI Says Nobody  
15 Killed at Sandy Hook. Correct?

16 ATTY. PATTIS: Is that the 25th rather than the  
17 24th?

18 ATTY. MATTEI: No, it's not.

19 BY ATTY. MATTEI:

20 A I don't recall the --

21 ATTY. PATTIS: Your exhibit list says 25th.

22 A I don't recall the date.

23 ATTY. MATTEI: No, it doesn't.

24 And I appreciate no interruptions, please.

25 BY ATTY. MATTEI:

26 A I don't recall the date, but I do recall the article  
27 you're talking about.

1           ATTY. MATTEI: I'm going to pull it up for you.  
2           Exhibit No. 67 already in evidence?  
3           THE CLERK: That is a full exhibit, Your Honor.  
4           ATTY. MATTEI: Thank you.  
5           THE COURT: Thank you.  
6           ATTY. MATTEI: Can you pull it up please,  
7           Pritika. Let's just pull up -- yeah, the top part.  
8           THE WITNESS: I see it.  
9           ATTY. MATTEI: Do you see it?  
10          THE WITNESS: Yes.  
11          BY ATTY. MATTEI:  
12          Q    The FBI says, No One Killed at Sandy Hook. Correct?  
13          A    Yes.  
14          Q    This is by Adan Salazar?  
15          A    Yes.  
16          Q    What's the date?  
17          A    It says September 24 of 2014.  
18          Q    Okay. Two days after the last email we saw with  
19          regard to Google Analytics. Correct?  
20          A    I believe that was dated the 22nd; so, yes.  
21          Q    Right. And you have an ad there for DNA Force Plus.  
22          Correct?  
23          A    I see that, yes.  
24          Q    And in this article Adan Salazar reports -- by the  
25          way, this article, you know, was posted to Facebook.  
26          Correct?  
27          A    I believe it was, yes.



1 Q Okay. This article was posted to Twitter. Correct?

2 A Yes.

3 Q This article was posted to Infowars.com?

4 A Yes.

5 Q PrisonPlanet.com?

6 A Yes.

7 Q Okay. And 2014, the jury will recall, was the year  
8 that Infowars had 2.2 billion impressions on its social  
9 media platforms. Correct?

10 A Oh, I don't recall the number, but -- all except that  
11 that's what it was.

12 Q You don't recall yesterday when I had the chart up  
13 here?

14 A Right, I just don't recall the exact number. But I  
15 don't dispute that's what it was.

16 Q Right. And let's just -- real clear -- let me ask  
17 you this question, yes or no, this article reporting that  
18 the FBI said no one had been killed at Sandy Hook according  
19 to its statistics was false. Yes?

20 A Correct, it's not right; that's right.

21 Q Not right, meaning not true. Correct?

22 A Right, FBI never said that.

23 Q But what Adan Salazar was saying to his audience was  
24 that there were these statistics that the FBI put out and  
25 that according to Adan Salazar those statistics said that  
26 nobody had been killed at Sandy Hook. Correct?

27 A That's what the article says, yes.

1 Q And, in fact, the statistics -- and the FBI does  
2 report crime statistics every year. Correct?

3 A Yes.

4 Q And, in fact, the FBI statistics that Adan Salazar  
5 was referencing did report the murders at Sandy Hook.  
6 Correct?

7 A I believe they did.

8 Q Yes. Thank you.

9 And let's scroll down here. This is a screenshot of  
10 the stats, right?

11 A Yes, this is the screenshot that Adan took of the  
12 table, and he used that as the source of the article.

13 Q Right. And he referred to Table 8, right?

14 A Yes.

15 Q And Adan Salazar knew that the FBI reported the  
16 murders at Sandy Hook in a different table in the same  
17 chart. Correct?

18 ATTY. PATTIS: Objection: asking about what  
19 another potential witness knew, relevance;  
20 speculation, what he knew or didn't --

21 THE COURT: Overruled.

22 BY ATTY. MATTEI:

23 A Do I know that he knew that? Based on my  
24 conversation with him I don't think that that's true; so,  
25 no.

26 Q You spoke with Adan Salazar?

27 A I did, yes.

1 Q You asked him specifically about this article?

2 ATTY. MATTEI: You can take it down.

3 BY ATTY. MATTEI:

4 A I did, yes.

5 Q He knew that you were preparing to testify before  
6 this jury. Correct?

7 A He knew I was going to be deposed, yes.

8 Q I mean, Adan Salazar himself was disposed, wasn't he?

9 A He was, yes.

10 Q Okay. He knew there was going to be a trial in this  
11 case.

12 A Yes.

13 Q Right. And he said to you -- First of all, he  
14 acknowledged he was wrong, yes?

15 A He did, yes.

16 Q But he said to you, but I didn't know it at the time.  
17 Right?

18 A Right. Would you like me to say what he said to me?

19 Q No.

20 A But -- But, yes.

21 Q He said to you, in substance, I didn't realize it at  
22 the time.

23 A That's what he said to me.

24 Q And he knew that you would tell this jury that.  
25 Right?

26 A He knew I would be deposed in this matter and  
27 possibly have to testify in court.

1 Q Right. And that's what you told him. That Adan  
2 Salazar didn't realize it at the time.

3 A That's what he conveyed to me, and that was --

4 Q That's Free Speech Systems' sworn testimony here.

5 A That's what was conveyed to me in my conversation;  
6 so, yes.

7 Q And the explanation that Free Speech Systems is  
8 offering this jury is that Adan Salazar just missed it. He  
9 didn't scroll down far enough to see that actually the FBI  
10 did report the murders.

11 ATTY. PATTIS: Objection to form.

12 THE COURT: Overruled.

13 BY ATTY. MATTEI:

14 A That's what he said to me in our conversation.

15 Q So, let's just -- just accept, for just a moment,  
16 that Adan Salazar, who published The Creepy Illuminati  
17 article, who tried to get registered at the  
18 Crisisactors.org, who's now writing a false article about  
19 FBI, says, Nobody Killed at Sandy Hook, let's just accept  
20 that that guy was telling you the truth for a moment, even  
21 if we accept that, you acknowledge that if Adan Salazar had  
22 just scrolled down a little bit further in the page he would  
23 have seen that that was false. Correct?

24 A Right. At the bottom of the page there is an  
25 asterisk there that would have indicated to him to go check  
26 another chart.

27 Q Right.

1           The other explanation though, if we don't give Adan  
2 Salazar the benefit of the doubt, is that he darn well knew  
3 what the statistics said on a page that he looked at, and  
4 published this anyway. Correct?

5           ATTY. PATTIS: Objection, argumentative.

6           THE COURT: Overruled.

7 BY ATTY. MATTEI:

8           A    I don't know, because I can only convey what he said  
9 to me.

10          Q    Well, let's look at what happened with this. Now, on  
11 September 24, the same day this article ran, Infowars ran a  
12 broadcast highlighting Adan's article, Sandy Hook Deaths  
13 Missing from FBI Report, right?

14          A    Yes.

15          Q    And then the next day, September 25th, Alex Jones had  
16 Wolfgang Halbig on. Correct

17          A    I don't recall the date. If we could pull up the  
18 video --

19          Q    Sure.

20                ATTY. MATTEI: Yeah, why don't we do that. Why  
21 don't we pull up that list.

22 BY ATTY. MATTEI:

23          Q    And while we're doing that, Ms. Paz, just if you  
24 could for the jury, Mr. Halbig had absolutely nothing to do  
25 with this article. Correct?

26          A    Oh, I don't believe he did, no.

27          Q    Do you have the chart in front of you yet?

1 A Not yet.

2 Q Okay.

3 Oh, okay, do you see -- do you see a listing here,  
4 Ms. Paz, September 25: FBI Says Nobody Killed at Sandy Hook  
5 Massacre, Featuring Wolfgang Halbig?

6 A September 25 -- Yes: Sandy Hook Deaths Missing from  
7 FBI Report, September 25th. Is that the one we're talking  
8 about?

9 Q No, no: FBI Says Nobody Killed at Sandy Hook  
10 Massacre, Featuring Wolfgang Halbig?

11 A Okay. Is that on Chart B -- Oh, okay, I see it on  
12 Chart B, yes.

13 Q Thank you.

14 A Yes.

15 Q All right. So, Adan Salazar writes this article on  
16 the 24th, they have a broadcast about it on the 24th, the  
17 next day Alex Jones comes in to talk about it, right?

18 A He does mention it, yes.

19 Q All right.

20 ATTY. MATTEI: So, why don't we play 19(A).

21 THE CLERK: This is a full exhibit, Your Honor.

22 THE COURT: Thank you.

23 (Exhibit 19(A) was played into the record.)

24 ATTY. MATTEI: Okay. Thank you.

25 BY ATTY. MATTEI:

26 Q So, that's the introduction, right?

27 A Yes.

1 Q And, obviously, Halbig's been on the show a couple of  
2 times. Alex Jones knows he's going to say Sandy Hook was  
3 fake, an illusion, right?

4 A I'm sure he would have said -- knew he was going to  
5 say more of the same.

6 Q Yeah. And so here we have -- this is 2014 now. This  
7 is nearly two years after the shooting, right?

8 A Almost, in September --

9 Q Right, almost --

10 A -- so close to two years.

11 Q Almost two years. But now they have this new thing  
12 about the FBI, so they bring on Halbig, right?

13 A I don't know if that was the reason why they brought  
14 him on that particular day.

15 Q Okay. Well, why else would they have brought him on  
16 when they titled the video: FBI Says Nobody Killed at Sandy  
17 Hook Massacre, Featuring Wolfgang Halbig?

18 A I don't know, I didn't ask Alex that specific  
19 question related to this video --

20 Q Okay. And so --

21 A -- so I'm not sure.

22 Q So, Free Speech Systems, having seen the article,  
23 having seen the title of the video, having now seen the  
24 intro to the video, they're still not prepared to say that  
25 that's why they were having Wolfgang on?

26 A I'm just not sure and I don't want to -- I don't want  
27 to guess.

1                   ATTY. MATTEI: So, let's go to 19(D), please.

2                   The same broadcast.

3                   (Exhibit 19(D) was played into the record.)

4                   BY ATTY. MATTEI:

5                   Q    So, here's Wolfgang Halbig on telling the audience of  
6 millions that Sandy Hook Elementary School was a toxic waste  
7 dump. Right, that's what he said?

8                   A    That's what he said, yes.

9                   Q    And Alex Jones says it was a total cut-out, right?

10                  A    That's the word he used, yes.

11                  Q    Right. And a cut-out is basically a set, right?

12                  Something set up as a stage to be a set. Correct?

13                  A    That's what I think he means by that, yes.

14                  Q    Right. Going back to what we heard earlier about  
15 this total production they were putting on, they needed a  
16 set for it, right?

17                  A    I -- I would assume -- I didn't ask him the specific  
18 question, so I don't know for sure. But --

19                  Q    I mean, that's something that you would have been  
20 expected to do; you knew that you were supposed to be  
21 prepared to testify about all these videos, right?

22                  A    Right. I watched all the videos.

23                  Q    Right. And you knew that you were going to be here  
24 testifying about these videos and that Alex Jones was  
25 featured in pretty much every single one, right?

26                  A    Almost every one, yes.

27                  Q    Right. And so -- But your testimony to the jury is



1 that you just didn't ask about this one?

2 A I don't know what's in his mind at the time.

3 Q So, when -- But you'd agreed with me though, at least  
4 when it comes to --

5 ATTY. PATTIS: Objection, as to the form, Judge.

6 ATTY. MATTEI: Withdraw it.

7 BY ATTY. MATTEI:

8 Q When it comes to the word cut-out, your testimony is  
9 he's talking about a set, right, like a stage?

10 A That's what I took it to mean, based on what he said.

11 Q And he said that it was closed until right before.

12 A He does say that.

13 Q Okay.

14 A He says that a couple of times.

15 Q So yet, in here, there's this fake set; they plop  
16 everybody down there to create this hoax, the illusion of a  
17 tragedy, right?

18 A Are you asking if that's what he means by that?

19 Q That's what's happening here. Correct?

20 A That's what he said.

21 Q Now, he says the school was closed until right before  
22 -- after Halbig says it was a toxic waste dump. And did --

23 Let's do this: are you aware that -- Oh, and then I  
24 think he said something like how could the parents send  
25 their children to that school, right?

26 A He said that a few times.

27 Q And the idea is, of course, that they wouldn't have,

1 if it was a toxic place. Right?

2 A I think that's what he meant by it.

3 Q Dawn Hochsprung was the principal of Sandy Hook  
4 Elementary School. Correct?

5 A Yes.

6 Q You're aware that she -- there's testimony that she  
7 and Mary Sherlach died in the lobby when they confronted the  
8 shooter. Correct?

9 A I think that was in the report; but, yes.

10 Q And Alex Jones, at the time he said this, was aware  
11 that Ms. Hochsprung had a Twitter account. Correct?

12 A Was aware at the time that he said the school was  
13 closed?

14 Q Yes, ma'am.

15 A I don't know.

16 Q Have you seen Dawn Hochsprungs's Twitter account?

17 A I have not, no.

18 Q Are you aware whether throughout the fall of 2012  
19 Hochsprung was posting pictures of what was happening in the  
20 daily activities at school?

21 A I have not seen the Twitter account; so, no.

22 Q Haven't seen her pictures about the book fair?

23 A I haven't seen anything on her social media; so, no.

24 Q About the Veteran's Day Breakfast they hosted?

25 ATTY. PATTIS: Objection, Judge, asked and  
26 answered, repetitive at this point, that she hadn't  
27 seen the Twitter account.

1 THE COURT: Sustained.

2 BY ATTY. MATTEI:

3 Q Do you recall on the very first day, the very first  
4 day that Alex Jones covered Sandy Hook, the day of the  
5 shooting, he was talking about drills, right? That this  
6 could be a drill. Do you recall that?

7 A Yes.

8 Q And he referred in that video to a Twitter photo he  
9 had seen from earlier in the year of kids doing a fire  
10 drill. Do you recall that?

11 A In the first video?

12 Q Yes. You watched it.

13 A Well, we watched it here.

14 Q We watched clips. But you've watched the whole  
15 thing. Correct?

16 A The first video?

17 Q Correct. The video, Connecticut Schoolmaster Looks  
18 Like False Flag, Witnesses Say, you watched that video, yes?

19 A Is that the video that I didn't see? That might have  
20 been the video that I didn't see.

21 Q You hadn't seen it before you were deposed. They  
22 never gave it you, right?

23 A Correct.

24 Q Then you were deposed, and you saw it. Correct?

25 A You mean, was I -- did I see it after I was deposed?

26 Q You saw it when you were deposed. I played it for  
27 you at your deposition, didn't I?

1       A    I don't remember. I know you played a bunch of  
2 things for me. I don't know if it was that particular  
3 video.

4       Q    Okay. So, you don't --

5       A    I don't remember.

6       Q    Okay. So, you don't recall, as you sit here right  
7 now, that on the very first day Alex Jones acknowledged that  
8 he had seen a photo of the kids doing a fire drill, you  
9 don't recall that?

10      A    I don't remember.

11      Q    And at the time he was trying to suggest that this is  
12 a drill, right, you remember that part?

13      A    I do -- Yes, I do remember that.

14      Q    But he is two years later saying the school was  
15 closed until right before it happened, right?

16      A    That's what he says, yes.

17      Q    Right. And you've not seen Dawn Hochsprung's Twitter  
18 photo from earlier in the fall of the children doing the  
19 fire drill. Correct?

20      A    I have not, no.

21      Q    But it's hard to keep track of lies, isn't it?

22                ATTY. PATTIS: Objection, argumentative.

23                THE COURT: Sustained.

24      BY ATTY. MATTEI:

25      Q    So, let's go onto the next clip.

26                ATTY. MATTEI: I think that was 19(D) we just  
27 saw. Let's go onto 19(E).

1 (Exhibit 19(E) was played into the record.)

2 ATTY. MATTEI: All right, Pritika -- I'm sorry

3 -- This is what we're going to do --

4 BY ATTY. MATTEI:

5 Is it Free Speech Systems' position today that the  
6 school was closed?

7 A No.

8 ATTY. MATTEI: Okay. Go ahead.

9 (Exhibit 19(E) was played into the record.)

10 BY ATTY. MATTEI:

11 Q They wished it was real, right?

12 A Are you asking whether he said that? He says that,  
13 yes.

14 Q "He," being Alex Jones.

15 A Alex said that, yes.

16 ATTY. MATTEI: Let's go to 19(G), please.

17 (Exhibit 19(G) was played into the record.)

18 Is that it? Go on. I'm sorry.

19 BY ATTY. MATTEI:

20 Q So, you saw that clip, right?

21 A Yes.

22 Q Wolfgang pleads, I need your help, right?

23 A I think he says that, yes.

24 Q And Alex Jones offers help. He says I'm going to  
25 send some reporters up there with you, right?

26 A Yes, he says, I have to send some reporters up there.

27 Q And you know that he had actually already done that,

1 because earlier that year -- do you remember the video we  
2 saw where -- that had start out, and Jones said, you know,  
3 Conspiracy Theory Shut Down at the Newtown Board of Ed?

4 A Yes, we sent Dan Bidondi up there.

5 Q Right. And Bidondi went up there for that one --

6 A Correct.

7 Q -- as an Infowars, quote, reporter. Correct?

8 A Yes.

9 Q And that was the time Wolfgang Halbig tried to get  
10 into the United Way and the police confronted him, right?

11 A Right, that was the same day.

12 Q Dan Bidondi was with him, yes?

13 A Yes.

14 Q And then after telling Wolfgang Halbig that he was  
15 going to send reporters up there with him, he plugged  
16 Wolfgang Halbig's website, Sandy Hook Justice, right?

17 A Yes. I think every time he's on, he puts the website  
18 up.

19 Q Sometimes they'll just put the link in the bottom so  
20 the viewers can see it, right?

21 A Correct.

22 Q Sometimes Alex Jones will say the website, Sandy Hook  
23 Justice.com, correct?

24 A Yes.

25 Q Sometimes they actually put up a screenshot of the  
26 website itself?

27 A Yes.

1 Q And on that website, Sandy Hook Justice, Wolfgang  
2 Halbig's website is entirely devoted to Halbig's claims that  
3 the shooting was fake, an illusion. Correct?

4 A Yep.

5 Q And Halbig also had a link on that website to help  
6 him raise money, didn't he?

7 A Yep.

8 Q Okay. And Alex Jones encouraged his audience to  
9 support Wolfgang Halbig financially. Correct?

10 A If they wanted, yes.

11 Q Let's go to --

12 ATTY. MATTEI: Was that (G)?

13 ATTY. PATTIS: Yeah.

14 BY ATTY. MATTEI:

15 Q Oh, and then right after he plugged the website, he  
16 gives his own store a little plug, right?

17 A He does that after all of the segments --

18 Q Right.

19 A -- so, yes.

20 Q Right. DNA Force Plus on this one?

21 A Yes.

22 Q And this -- this video, obviously, would have been  
23 uploaded to Infowars.com after, right?

24 A Sure.

25 Q Would have been clipped up and titled, yes?

26 A Yes.

27 Q Okay. And when it was, viewers could click on

1 Infowars store and go buy a product, right?

2 A Right.

3 Q And that's the type of thing Google Analytics will  
4 tell you, right?

5 A Whether they clicked from that particular video?  
6 Yes, you would be able to tell if you clicked from, say,  
7 Adan Salazar's article and then they went to the store, and  
8 then subsequently purchased from the store. You'd be able  
9 to tell that.

10 A Right.

11 Q And if they purchased DNA Force, it looks like it's  
12 on sale for \$129.95, yes?

13 A At the time of that airing, yeah.

14 Q Yeah.

15 A I don't know what it -- what it goes for now, I don't  
16 know -- At that time.

17 Q They still -- Yeah, they still sell it.

18 A I think so, yes.

19 Q All right.

20 ATTY. MATTEI: So, let's play 19(I).

21 (Exhibit 19(I) was played into the record.)

22 BY ATTY. MATTEI:

23 Q That's not the first time we've seen Alex Jones  
24 mockingly cry about what happened to these families, is it?

25 A I think we talked about another video earlier, yes.

26 Q And it's not the last time he did it either.

27 A I don't remember if he does it again, I'm not sure,



1 but --

2 Q And there, he's talking about not just one, but a  
3 bunch of parents doing this, right?

4 A He says that in the video, yes.

5 Q Sure does.

6 He also says you got a hundred kids, and nobody can  
7 find them. Right?

8 A He said that in the video, yes.

9 Q And what he's telling his audience is that they  
10 rolled in all these kids for the big production, but, of  
11 course, because they were actors, nobody can find them now.  
12 Right?

13 A I don't really know what he's referring to there.

14 Q And when he refers to the pictures of children who  
15 were killed who are still alive, he's telling his audience  
16 that the children they say died, are still alive, they were  
17 actors, isn't he?

18 A I don't know what he's saying there. I know what he  
19 said --

20 Q Ms. Paz, you saw the video?

21 A Yes.

22 Q He said you have pictures of children who died who  
23 are still alive. Correct?

24 A He said that.

25 Q And that happens because the children were faking it  
26 themselves. Correct?

27 ATTY. PATTIS: Objection; argumentative, Judge.

1 The video speaks for itself.

2 THE COURT: Overruled.

3 BY ATTY. MATTEI:

4 A I don't know what he's referring to there. He  
5 doesn't say.

6 Q Are you able to use your powers of deduction, Ms.  
7 Paz, to tell this jury what Free Speech Systems now knows,  
8 which is that he was referring to the children themselves as  
9 being actors?

10 ATTY. PATTIS: Objection.

11 THE COURT: Sustained.

12 BY ATTY. MATTEI:

13 Q Is Ben Wheeler an actor?

14 ATTY. PATTIS: Objection.

15 THE COURT: Overruled.

16 BY ATTY. MATTEI:

17 A Is Ben Wheeler an actor?

18 Q Yes.

19 A No, Free Speech Systems doesn't contend that he is.

20 Q Is Avielle Richman an actor?

21 A No.

22 Q Is Dylan Hockley an actor?

23 A No.

24 Q Is Daniel Barden an actor?

25 A No.

26 Q Is Emilie Parker an actor?

27 A No.

1 Q Is Bill Aldenberg an actor?

2 A No.

3 ATTY. MATTEI: Let's go to 19(J), please.

4 (An exhibit was played into the record)

5 ATTY. MATTEI: I think we have to stop this one.

6 I meant 19(J), please.

7 Thanks, I'm sorry.

8 (Exhibit 19(J) was played into the record)

9 BY ATTY. MATTEI:

10 Q That was September 25th. That's what we just saw,  
11 right?

12 A I believe that was the date, yes.

13 Q The article, FBI Says No One Killed at Sandy Hook,  
14 was the 24th. Correct?

15 A Yes.

16 Q The first broadcast was the 24th, that same day?  
17 It's what we looked at earlier.

18 A Okay.

19 Q Than Halbig comes on the 25th.

20 A Yes.

21 Q That's what we just saw.

22 A Yes.

23 ATTY. MATTEI: Can we pull up Exhibit 133,  
24 please?

25 THE CLERK: 133 is not a full exhibit, Your  
26 Honor.

27 ATTY. MATTEI: I think it's agreed to.

1                   ATTY. PATTIS: It is agreed to, Judge.

2                   THE COURT: So ordered.

3                   BY ATTY. MATTEI:

4                   Q    This is an email sent three days later by Wolfgang  
5 Halbig to Nico Acosta. Correct?

6                   A    That's what it says, yes.

7                   Q    Nico Acosta was the producer for the Alex Jones Show,  
8 yes?

9                   A    Yes.

10                  Q    Can you read what Wolfgang writes to Nico?

11                  A    You want me to read the whole thing?

12                  Q    I do.

13                  A    Sure. "Nico, please thank Alex again for his great  
14 work in helping our cause in funding our legal bill. We are  
15 receiving donations because of him. Please ask him if he  
16 would donate at least a dollar, as well as you, to -- as  
17 well as you, to be on our Sandy Hook Justice team. Thanks  
18 again, Wolfgang."

19                  Q    How much -- How much money did Wolfgang Halbig get as  
20 a result of Alex Jones's encouraging his audience to  
21 support?

22                  A    I don't know.

23                  Q    All right. Now, let's talk about this article.

24                               ATTY. MATTEI: Can we pull up Exhibit 134,  
25 please.

26                               This is not yet in evidence, but it's agreed to,  
27 Your Honor.

1           ATTY. PATTIS: It is agreed, Judge.

2           THE CLERK: It is a full exhibit, Your Honor.

3           ATTY. MATTEI: I'm sorry, it's been -- I haven't  
4 offered it.

5           THE CLERK: It was admitted day one.

6           ATTY. MATTEI: Oh, it was?

7           THE CLERK: Yes.

8           ATTY. MATTEI: Thank you very much.

9 BY ATTY. MATTEI:

10       Q   Now, this is an email from Tim Fruge, the business  
11 director for Infowars, correct?

12       A   At that time, yes.

13       Q   Yes, at that time.

14       A   Uh-hmm.

15       Q   October 14, 2014. Correct?

16       A   That's what it says.

17       Q   Three weeks after the article ran and the videos ran  
18 that we just saw, right?

19       A   Yes.

20       Q   And it's to Adan Salazar, the author of that false  
21 article. Correct?

22       A   Yes, it is to Adan, yes.

23       Q   And it has some attachments. The attachments are  
24 entitled, Alexa Unique Visits. Correct?

25       A   That's what it says, yes.

26       Q   Okay. Now, Alexa, I think we talked about yesterday,  
27 is another web-based program that allows you to kind of see

1 where your rankings are as a website. Correct?

2 A I believe that's correct, yes.

3 Q We saw those rankings yesterday in one of the media  
4 kits where Alex Jones was on top and then there were other  
5 media outlets below him. Correct?

6 A Right. I remember that.

7 Q Right, right. And none of those other media outlets  
8 that we saw yesterday, they never said Sandy Hook was fake,  
9 did they?

10 A Which media outlets? What do you mean?

11 Q You remember we saw Rush Limbaugh?

12 A Oh, okay. I don't believe there's an -- any  
13 allegations that they had said such things, so.

14 Q Okay. And then the second attachment is what?

15 A It's says Google Analytics.jpg.

16 Q Right.

17 ATTY. MATTEI: So, let's go down to the second  
18 page.

19 All right. The jury will remember this from  
20 opening.

21 BY ATTY. MATTEI:

22 Q Do you see there a chart?

23 A I see it.

24 Q And this chart is Google Analytics. Correct?

25 A I don't know if it's Google or Alexa or -- one of  
26 them. But it looks like analytics.

27 Q Check. And what we see here are -- is a chart with

1 dates along the bottom. Correct?

2 A Yes, I see that date range from September 22nd  
3 through October the 13th.

4 Q And if you look at this line here -- and I know I'm a  
5 little bit far away, but I want everybody to be able to see  
6 it -- maybe it's easier if I go over there --

7 ATTY. MATTEI: May I, Your Honor? May I go over  
8 there?

9 BY ATTY. MATTEI:

10 Q So, let's see here. You have September 22nd, right?

11 A Yes.

12 Q Okay. And it's broken up into weeks. So, you have  
13 September 22nd to September 29, yes?

14 A One-week period, yeah.

15 Q Okay. And there are, let's see -- one line, two  
16 lines, three lines, four lines -- so, it's looks like each  
17 line represents about two days. Yeah?

18 A Sure.

19 Q Okay. So, we come to the second line, this would be  
20 September 24, right?

21 A Or thereabouts.

22 Q Or thereabouts.

23 A Sure.

24 Q The third line might be September 26th or  
25 thereabouts.

26 A Or thereabout.

27 Q Fourth line, September 28, somewhere in there, yes?

1 A Sure.

2 Q And what we're seeing here are a chart showing unique  
3 visitors. Correct?

4 A Yes, that's what it says.

5 Q And unique visitors are bumping along here in  
6 September around, let's say, just shy of 500,000 a day; yes?

7 A About.

8 Q We're eyeballing it, right?

9 A Right, right. About.

10 Q About 500,000 a day?

11 A Sure, approximately.

12 Q And right around between September 24 and September  
13 25 -- and this article was published -- it spiked just under  
14 two million. Correct?

15 A I mean, that some -- So, it looks like more than one-  
16 and-a-half, I'll say that. It's not quite two, but it's not  
17 one-and-a-half; so, probably more than one-and-a-half.

18 Q Okay.

19 A Yes.

20 Q You're not going to argue with me that there's a  
21 spike?

22 A It looks like a spike, yes.

23 Q And that spike, you would say, goes from somewhere  
24 south of 500,000 to somewhere between one-and-a-half, two  
25 million unique visitors. Correct?

26 A Somewhere about one-and-a-half and less than two,  
27 sure.



1                   ATTY. MATTEI: Let's go to the next chart.

2   BY ATTY. MATTEI:

3       Q   Now, this one --

4                   ATTY. MATTEI: -- no, no, no. I'm sorry -- so  
5       you could do -- have the -- I want to do the next  
6       spiking.

7                   All right.

8   BY ATTY. MATTEI:

9       Q   Now, this one is measuring page views, yes?

10      A   Yes, I see that.

11      Q   Same idea. You got the dates on the bottom.

12      A   Yes, I see that.

13      Q   All right. And what you're seeing here is bumping  
14   along, let's say, somewhere between one and two million,  
15   right up until the article was published, right?

16      A   Yes. So, somewhere above one-and-a-half, but less  
17   than two. I see that.

18      Q   And then it spikes up to about three million. Can you  
19   agree?

20      A   About three, yeah, that's what it looks like.

21      Q   That's per day page views, yes? That's what we're  
22   measuring here, page views per day.

23      A   Measure page views, right -- well, in that two  
24   day-ish period --

25      Q   Right.

26      A   Right.

27      Q   Right. Over the past 28 days, what you see here is

1 that they had 34.2 million page views.

2 A Right, that's what I said.

3 Q Let's go to visits.

4 ATTY. MATTEI: Is there a visits there?

5 ATTY. KOSKOFF: Yep.

6 BY ATTY. MATTEI:

7 Q So, now you see -- the same idea, but we're talking  
8 about visits, right?

9 A Yes.

10 Q Bumping along here, let's say between -- I don't  
11 know, 400,000 and 700,000 let's say, visits per day --

12 A Yes.

13 Q Right?

14 A I see that.

15 Q It spikes up to over 2 million when the article was  
16 published and when the videos came out, yes?

17 A In that period --

18 Q Right.

19 A -- right.

20 Q Right.

21 A I see that.

22 Q All right.

23 ATTY. MATTEI: Now, let's go to the next chart.

24 BY ATTY. MATTEI:

25 Q You remember there were multiple attachments here.

26 A I saw that, yeah.

27 Q All right.

1                   ATTY. MATTEI: Let's stay on that one right  
2                   there.

3   BY ATTY. MATTEI:

4           Q    Okay. Now, similar idea. You obviously recognize  
5           this to be Google Analytics, right?

6           A    Yes, I do.

7           Q    All right. And do you see here -- again, dates along  
8           the horizontal axis -- axis, beginning September 15th,  
9           right?

10          A    Yes.

11          Q    All right. And Google Analytics, you testified  
12          earlier, measures things like web performance, visitors,  
13          clicks, all that stuff, right?

14          A    Sure.

15          Q    So, here we are, mid-September -- the week, you know,  
16          between September 15th and September 22nd. You're about,  
17          oh, one, one-and-a-half million, right, page views here  
18          we're talking about. You see that?

19          A    Yes. So, that's -- on September 15th it spikes up a  
20          little bit above one-and-a-half -- I don't know, maybe --

21          Q    Oh, thank you. Yeah, yeah, okay. So, we're just  
22          focusing on this first week. Right.

23          A    Right.

24          Q    There's a little bit of a spike on September 15th,  
25          isn't there?

26          A    Yes.

27          Q    Okay. And then it's kind of cruising along below 1.5

1 million until September 22nd, right?

2 A Right. It hovers around one-and-a-half million and  
3 drops off --

4 Q Okay. Let's pull back from the chart here --

5 A Uh-hmm.

6 Q -- just focus on my questions, Ms. Paz, okay?

7 A Sure.

8 Q And here again, in the next week, from September  
9 22nd-September 29, do you agree with me that page views --  
10 ATTY. PATTIS: Object -- Objection to the form,  
11 Judge.

12 ATTY. MATTEI: Fine, Your Honor.

13 BY ATTY. MATTEI:

14 Q Am I correct that page views jump up to just under 3  
15 million over the two days when this article was published  
16 and the videos were broadcast?

17 A Yes, I do see the spikes that you're pointing to,  
18 just under 3 million page views.

19 Q And this period covers, let's say -- I don't know,  
20 September 13th to about October 13th, right? It's about a  
21 month of data, yes?

22 A Yeah, give or take. It doesn't say the exact days,  
23 but --

24 Q And what Google Analytics is telling you here in this  
25 chart is that 33.4 percent of all page views during this  
26 month were new visitors. Correct?

27 A The green slice of the pie?

1 Q That's right.

2 A Yes.

3 Q The green slice -- Green means new visitors, right?

4 A Yes.

5 Q Blue means returning visitor.

6 A Yes.

7 Q And for this month 33.4 percent of the people  
8 visiting were new, right?

9 A That's what it says, yeah.

10 ATTY. MATTEI: Let's go to the next chart,  
11 please.

12 Is that it for that one? Okay, okay great.

13 BY ATTY. MATTEI:

14 Q Now, Ms. Paz, having seen all that now -- By the way,  
15 why did Tim Fruge send all those analytics to Adan Salazar,  
16 who wrote that article?

17 ATTY. PATTIS: Objection to the form, Judge.

18 THE COURT: Overruled.

19 BY ATTY. MATTEI:

20 A I don't know. I didn't ask about it.

21 Q "You don't know."

22 Having seen that, and now coupling that with all the  
23 other emails we saw during the proceeding two months about  
24 Google Analytics, will Free Speech Systems now tell this  
25 jury that, yes, it did in fact use Google Analytics?

26 A I'm sorry, I have just the same answer: I don't  
27 know.

1           ATTY. MATTEI: Let's pull up Exhibit 135,  
2           please.

3           It's agreed to, Your Honor.

4           ATTY. PATTIS: I think it's already in.

5           ATTY. MATTEI: If it is --

6           THE CLERK: 135 is not in yet.

7           ATTY. PATTIS: Oh, agree.

8           BY ATTY. MATTEI:

9           Q   All right. Now, here we are again, October 9th.  
10          What was the date of the last, do you remember? Okay. I'll  
11          tell you. The email we just saw that Tim Fruge sent to Adan  
12          Salazar was October 14th. This is October 9th. Just a few  
13          days ago, yeah?

14          A   That's what it looks like, yeah.

15          Q   Okay. It's Tim Fruge again --

16          A   Yes.

17          Q   -- sending a Google Analytics Facebook example to a  
18          guy named R -- Rob R. Who's that?

19          A   I'm not sure -- I'm not sure as I sit here, I'm  
20          sorry.

21          Q   You can tell from the email address he's an Infowars  
22          employee, yes?

23          A   Yes, yes.

24          Q   All right.

25               ATTY. MATTEI: And let's bring up that analytics  
26          Facebook example.

27           BY ATTY. MATTEI:

1 Q All right. Let's pull up -- Now, you see here, this  
2 is September 23rd, right?

3 A That's what it says, yeah.

4 Q Am I correct, ma'am, I know Free Speech Systems'  
5 testimony here, over and over again, is that it doesn't know  
6 whether it used Google Analytics. But do you know whether  
7 Google Analytics was available to Infowars to also track its  
8 performance on social media?

9 A I don't. I'm sorry.

10 ATTY. MATTEI: Let's pull up this --

11 BY ATTY. MATTEI:

12 Q -- just to pie-chart you with all the colors, okay --

13 ATTY. MATTEI: -- I'm sorry, I should have said  
14 with a date, as well.

15 Q Now, can you remind the jury when that article, FBI  
16 Says Nobody Killed at Sandy Hook, published?

17 A Is that a question to me?

18 Q It is.

19 A I believe it's September 24th.

20 Q Right. So, this is the day before, right?

21 A That's what it looks like.

22 Q And what it shows here are the top channels through  
23 which people are arriving to Infowars.com. Correct?

24 A Oh, how they're getting to the website, yeah, so --

25 Q How they're getting to the website.

26 A -- direct search or organic search. Yes, that's what  
27 it looks like.

1 Q Right. And so what you see here is direct visitors.  
2 What that means is people just typing Infowars.com because  
3 they want to go there, right?

4 A Right.

5 Q Organic search means people who are searching for  
6 Infowars.com get sent to there. Correct?

7 A Or it's coming up on search terms. If they're --  
8 say, they search Alex Jones or they search a particular  
9 topic and they're coming up on the Google search results  
10 organically.

11 Q Organically.

12 A Right. So, it would include search terms, not  
13 necessarily just Infowars.

14 Q Right. So, somebody searching on Google, quote, FBI  
15 Says Nobody Killed at Sandy Hook, they're coming to  
16 Infowars, that's an organic search, right?

17 A Right.

18 Q And so, the direct -- On September 23rd -- I'm going  
19 to come this way, away from the jury's way -- the direct --  
20 and you have the screen in front of you, right?

21 A Uh-hmm.

22 Q On the day before they publish this article, is 39.3  
23 percent of all visitors are coming direct. They know they  
24 want to go to Infowars.com, type it in, go. Right?

25 A That's what it says, yes.

26 Q 25 percent are searching for something on Google,  
27 Infowars.com comes up, they click on it, they come; yes?



1 A Right.

2 Q 24.2 percent are clicking on a link on social media.  
3 Correct?

4 A That's what that says, yes.

5 Q And then they're coming to Infowars.com through that  
6 link.

7 A Right.

8 Q Okay. 10 percent are being referred from another  
9 website. That means -- because you know that Infowars.com,  
10 at this time, was paying to advertise itself on other  
11 websites, right?

12 A Right.

13 Q And so they do that to get more visitors to their  
14 site. So, another website had referred them there, right?

15 A Right.

16 Q And then there's -- Okay. And then it looks like  
17 there's two other categories that are not -- because one is  
18 email, right?

19 A Yes.

20 Q And you know that Infowars had a daily email  
21 newsletter that would go out?

22 A Yes, it has a newsletter.

23 Q Okay. And so, people can click on -- and that  
24 newsletter contains links to all the stories that Infowars  
25 runs that day.

26 A Right.

27 Q Okay. So, you know, you get an email in your inbox:

1 good morning, here's the latest stories from Infowars.

2 Right?

3 A Right.

4 Q Okay.

5 All right. Now, let's go to -- Now, let's go down  
6 the page a little bit. And, whereas the pie chart shows the  
7 percentages, this shows the numbers; yes?

8 A That's what it looks like, yes.

9 Q And so, on September 23rd, the day before the article  
10 runs, they had a total of 543,000 sessions. Yeah?

11 A Yes.

12 Q 31 percent of those were new.

13 A New sessions, yes.

14 Q New sessions, okay. All right. Great.

15 ATTY. MATTEI: So, let's go down to the next  
16 day.

17 Q Here we are on September 24, right?

18 A Yes.

19 Q This is the day of the article now, yes?

20 A Yes.

21 Q And just to remind the jury, this is an email sent  
22 three weeks after the article ran, right?

23 A This chart is in the email? I believe that's the  
24 date, yes, in early October; right.

25 Q Three weeks after the article runs, Tim Fruge, the  
26 business director, is putting together numbers for these  
27 dates. Right?

1 A That's what it looks like.

2 Q On the day the article runs -- Do you remember on the  
3 chart before --

4 ATTY. MATTEI: Let's just go back up just for a  
5 minute --

6 MS. SESHADRI: (Indiscernible)

7 ATTY. MATTEI: -- the pie chart, yeah.

8 BY ATTY. MATTEI:

9 Q On September 23rd, you remember that social media was  
10 24.2 percent of traffic to Infowars.com, right?

11 A I see that, yeah.

12 ATTY. MATTEI: Let's go to the next one.

13 Q On the 24th, social media more than doubles as the  
14 source for traffic to Infowars.com, right?

15 A That's what it looks like, yes.

16 Q It goes from 24 to 54 percent of all traffic coming  
17 into Infowars.com is being sent from social media. Correct?

18 A That's what it says, yes.

19 Q This is the year Alex Jones had 2.2 billion  
20 impressions on social media. Correct?

21 A I don't recall the number, but I know we talked about  
22 that yesterday.

23 Q Right.

24 A Yes.

25 Q And whereas before the direct -- on the day before,  
26 the direct traffic that people coming into Infowars.com is  
27 now in half, right?

1 A Right, that's what it says.

2 Q Right. And so, Ms. Paz, what we're seeing here,  
3 according to Infowars Google Analytics is Adan Salazar's  
4 false article is taking off on social media and resulting in  
5 traffic into Infowars.com. Correct?

6 ATTY. PATTIS: Objection, Judge, argumentative.

7 THE COURT: Overruled.

8 BY ATTY. MATTEI:

9 Q That's what we're seeing.

10 A I don't know what caused the spike. But as we said  
11 earlier, his article would have been posted to all of our  
12 social media outlets. So, I mean, its -- Could it have  
13 been? Yes, it could have been.

14 Q Well --

15 A I don't know from looking at this what they're  
16 clicking on, from the what -- from social media.

17 Q Right. But you do know that the email we just showed  
18 had Tim Fruge sending Adan Salazar, the author of the  
19 article, similar data about performance over the weekend.  
20 Correct?

21 A I saw the email, yes.

22 Q Okay. And now we're seeing just a few days before  
23 Tim Fruge putting this together for the exact same week.  
24 Correct?

25 A For the same two-day period, yes.

26 Q Right. And you know that over the same time period,  
27 because of all this increased social media traffic coming to

1 Infowars, its revenue spiked, as well. Correct?

2 A I'd have to see the numbers, but --

3 Q I'll show you that in a minute.

4 A Sure.

5 Q So, on the day the article is published, social media  
6 accounts for more than half of all referrals to  
7 Infowars.com, right?

8 A That's what it says, yes.

9 Q All right.

10 ATTY. MATTEI: Let's go down to the next part of  
11 this. Okay.

12 BY ATTY. MATTEI:

13 Q Now, again --

14 ATTY. MATTEI: Thank you. You read my mind.

15 Q September 23rd, you'll recall that the total sessions  
16 the day before the article was published was 543,000, right?

17 A Yes.

18 ATTY. MATTEI: Let's go to September 24th. I  
19 want to see the sessions. It's down a little  
20 further. Thank you.

21 BY ATTY. MATTEI:

22 Q Okay. It goes from 540-something-thousand to 1  
23 million sessions on the day it's published. Correct?

24 A I see that, yes.

25 Q Yeah, 583,000. More than half of it now coming from  
26 social media. Correct?

27 A I see that, yeah.

1                   ATTY. MATTEI: Let's go to September 25th --  
2                   yeah, you had it -- there you -- yep.

3                   BY ATTY. MATTEI:

4                   Q    The pie chart, so you can get started.

5                   All right, September 25th. September 25th is the day  
6 Alex Jones has Wolfgang Halbig on the show -- We saw that,  
7 right?

8                   A    Right.

9                   Q    -- to talk about the article. Do you remember the  
10 title?

11                  A    Right. He talked about other things too, but --

12                  Q    Correct.

13                  A    -- including the article, yeah.

14                  Q    Right. He talks about the cut-out, right?

15                  A    Yes.

16                  Q    He talks about the toxic waste dump, right?

17                  A    Yes.

18                  Q    Alex Jones does the mock crying. Correct?

19                  A    Yeah, he talks about a few things.

20                  Q    He talks about a hundred kids that no longer can be  
21 found, right?

22                  A    He said that in the video, yes.

23                  Q    He talks about photos of kids who they say died, were  
24 still alive. He talks about all that, yes?

25                  A    He said that in the video, yeah.

26                  Q    This is the day he did that.

27                  A    I think that's the same day, yes.

1 Q Right. And now on this day -- we saw on the day  
2 before, the day the article was published, social media went  
3 from about 24 percent to over 50 percent, right, of the  
4 referral bracket?

5 A Yeah.

6 Q Now, it's up to how much?

7 A 80 -- Is that an 8 -- 86.3.

8 Q That looks like 63.

9 A Okay, 66.3.

10 Q That's what it looks like to me.

11 A Sorry -- It's hard to tell on the screen -- 66.3.

12 Q Okay, 66.3. It spikes again, right?

13 A That's what it looks like.

14 Q Okay. And now, direct traffic to Infowars.com,  
15 people who actually know they want to go there, is only at  
16 20 percent, yes?

17 A Yes.

18 Q So, everybody, all these extra people that are coming  
19 to Infowars.com are getting there from social media. Yes?

20 A Yes.

21 Q Okay. And when they get there, they're seeing ads,  
22 right?

23 A When they get where, to the article?

24 Q Infowars.com --

25 A Oh, yes; yeah.

26 Q -- they're seeing it. I mean, we actually saw an ad  
27 right next to the article for DNA Force Plus, right?

1 A They're on all of the articles.

2 Q Right.

3 A Every article has an ad.

4 Q Right now I'm only asking you about one of them.

5 A Sure. That article, there was an ad.

6 Q And there was a 33 percent sale on DNA Force, right?

7 A I think that's what it said.

8 Q All right. Now, here --

9 ATTY. MATTEI: Let's go down to the numbers now  
10 Pritika.

11 Q On September 24 it was just over a million sessions  
12 in the day, right?

13 A I recall that, yes.

14 Q Now, it's at 1.7 million, right?

15 A That's what it says, yes.

16 Q With 1.1 million coming from social.

17 A That's what it says.

18 Q Dwarfing all the other sources -- referrals.

19 Correct?

20 A It is the largest source.

21 ATTY. MATTEI: Okay. Let's pull that now.

22 Let's go down to -- Is there one for the 26th?

23 BY ATTY. MATTEI:

24 Q Now, still going here, right? Now, the 26th, it's a  
25 little bit down, it had been 66 percent on the day of the  
26 video broadcast from Halbig. Now, we're one day on, social  
27 media is still way above where it was before the article was



1 written, but it's starting to ebb a little bit, down to 53  
2 percent of all sources to the -- to Infowars.com. Right?

3 A Right. I see that.

4 Q Its down from 66 to 53.

5 A To 53. Yeah, I see that.

6 ATTY. MATTEI: Let's go down to the numbers,  
7 please.

8 Q And, the day before, you had seen 1.7 million total  
9 sessions; it's down to 950,000, right?

10 A Yes.

11 Q And the day earlier, on the day of the broadcast,  
12 social media, as a source of referral, had been at about a  
13 million, and now it's just over half-a-million; yes?

14 A Yes.

15 Q Okay. So, now it's coming down, right?

16 A Yeah.

17 Q So, what we're seeing now is the backside of that  
18 spike we saw on the other charts. Correct?

19 A That's what it looks like.

20 Q All right.

21 ATTY. MATTEI: Let's go down to the next -- if  
22 there is a next.

23 By ATTY. MATTEI:

24 Q Okay, 27. And we're seeing that same phenomenon  
25 here. Now, we're two days after the video broadcast, right?

26 A Yep.

27 Q Social media is starting to come down again as a

1 source for referral, yes?

2 A Slightly, yes.

3 Q Right. Well, it had been 50 --

4 A Yeah, it was like 52 percent, or something to that  
5 effect.

6 Q Okay, so it's still down. So, that article is still  
7 doing okay, right?

8 ATTY. PATTIS: Objection: speculative.

9 THE COURT: Overruled.

10 By ATTY. MATTEI:

11 A I think we said earlier, I'm not really sure how they  
12 were getting there from social. So, it's from social -- it  
13 depends on how many posts there were that day and what posts  
14 they were clicking on that day.

15 Q Right.

16 A So, I can't say for sure which posts they were  
17 clicking on.

18 Q Right. So, you're -- You're not going to testify  
19 here under oath, are you, that the article published on  
20 September 24, 2014, and the video on September 24, 2015 --  
21 September 25th -- September 25, 2014 -- you're not going to  
22 tell this jury that that article and those videos are the  
23 reasons for these spikes, are you? You're not going to tell  
24 them that.

25 A I would be speculating. I don't know for sure.

26 Q Yeah. I mean, you have all this evidence in front of  
27 you, but you still believe it's speculation?

1                   ATTY. PATTIS: Objection.

2                   THE COURT: Sustained.

3                   BY ATTY. MATTEI:

4           Q     So, on September 27, it's going down. Now, direct  
5 referrals are going -- creeping back up, right?

6           A     I see that, yeah.

7                   ATTY. MATTEI: So, now the 28th.

8           Q     And now you have direct, which is now in blue --  
9 direct now comprises the virality, right, 34.8 percent of  
10 all referrals are -- are now back to being direct. Yes?

11          A     I see that, yeah.

12          Q     And social media, close behind, but now not the top  
13 referrer.

14          A     I see that, yes.

15          Q     Okay. All right.

16                 Now, what I want to do, Ms. Paz, is I want to bring  
17 up -- now you testified yesterday that you've heard the  
18 testimony of David Jones and Timothy Fruge that the business  
19 model here is maximize audience to the website and then send  
20 them to the store and hopefully they buy stuff. That's the  
21 business model.

22          A     Right.

23          Q     All right.

24                 So, what I'm going to do now --

25                   ATTY. MATTEI: One moment, Your Honor, if I may?

26                   THE COURT: Take your time.

27                   ATTY. MATTEI: Can we bring up Exhibit 278, for

1 Ms. Paz, please?

2 THE CLERK: This is not a full exhibit.

3 ATTY. MATTEI: That's right. Just for Ms. Paz.

4 BY ATTY. MATTEI:

5 Q Ms. Paz --

6 ATTY. PATTIS: May I have a moment, please?

7 THE COURT: Take your time.

8 ATTY. PATTIS: I'm ready. Thank you.

9 BY ATTY. MATTEI:

10 Q -- one of the things that you were asked to prepare  
11 on was revenue to Infowars. Correct?

12 A Yes. I believe that was one of the topics.

13 Q And you testified yesterday that between 2012 and  
14 today -- withdraw that. Between 2012 and the moment you  
15 were testifying yesterday, Infowars had made hundreds of  
16 millions of dollars. Correct?

17 A I said I couldn't subscribe to a number because I  
18 would just have to see the numbers, but, yes, it's millions  
19 and millions of dollars.

20 Q No, no, no, yesterday you agreed that Infowars,  
21 during that time period, had made hundreds and hundreds of  
22 millions of dollars, although you didn't know the precise  
23 number. Correct?

24 A Right, I don't know the number. I don't know the  
25 price -- precise number.

26 Q But that's what you testified. I just want to make  
27 it very, very clear, because just now, a moment ago, you

1     tried to say that you had testified that they had millions  
2     and millions. But what you said yesterday was that Infowars  
3     had made hundreds and hundreds of millions of dollars  
4     between 2012 and the date of your testimony --

5         A     I don't remember. But I'll accept what you're  
6     saying. I mean, I know that they've made millions and  
7     millions of dollars. I just don't want to say how much,  
8     because I just don't recall. I wanted to refresh my  
9     recollection of how much.

10        Q     You're the corporate representative for Free Speech  
11     Systems. Correct?

12        A     Yes.

13        Q     You're required to prepare yourself to testify about  
14     the revenue that Free Speech Systems received. Correct?

15        A     Yes, I was asked.

16        Q     I am not asking you for a precise number. Let's  
17     start here: Are you able to testify as Free Speech Systems  
18     Corporate Representative that between the years 2012 and  
19     yesterday, Free Speech Systems has made more than a hundred  
20     million dollars?

21        A     I think that's fair.

22        Q     Are you able to testify that it's made more than two  
23     hundred million dollars?

24        A     I don't know. I would like to see the numbers.

25        Q     Are you able to testify that it's made more than a  
26     billion dollars?

27                ATTY. PATTIS: Judge, badgering, at this point.

1 THE COURT: Overruled.

2 BY ATTY. MATTEI:

3 A I don't think it's made a billion dollars. So, no,  
4 it hasn't.

5 Q Okay. So, your testimony, right now, is you're  
6 testifying to this jury that you can testify under oath that  
7 Free Speech Systems has made somewhere between a hundred  
8 million dollars and a billion dollars between 2012 and  
9 yesterday. Correct?

10 A No, I think what I said was I don't know what the  
11 number is.

12 Q I'm asking you a different question now.

13 A Okay.

14 Q You just testified that, yes, you can tell this jury  
15 Infowars has made over a hundred million dollars, but you're  
16 not willing to tell them that it's made a billion dollars.

17 So, now I'm focusing on this range, that at least  
18 you're willing to testify to this range, and the range that  
19 I just heard you testify to is you can tell this jury that  
20 Free Speech Systems has made over a hundred million dollars  
21 since 2012 and between a billion dollars, but that's as  
22 specific as you can get. Right?

23 A Without seeing documents, yes.

24 Q Okay. So, let's look at -- You have the exhibit in  
25 front of you, right?

26 A Yes.

27 Q Now, Infowars produced some sales revenue in this

1 case. Correct?

2 A I believe it has, yes.

3 Q And one of the platforms that you testified earlier  
4 that Free Speech Systems makes money over is  
5 Infowarsshop.com.

6 A One of the ways, yes.

7 Q And Infowarsshop.com was in 2014 -- was the principle  
8 online -- the main online store for Free Speech Systems,  
9 right?

10 A I think that's fair, yes.

11 Q And 2015 they transferred over to Infowarsstore.com.

12 A Right.

13 Q Right. But before 2015 it was Infowarsshop.com.

14 A Yes.

15 Q All right. And Free Speech Systems produced sales  
16 revenue for 2014 occurring over Infowarsshop.com. Correct?

17 A I believe we did, yes.

18 Q And that's what you see before you, yes?

19 A I -- I think that's what this is, yes.

20 ATTY. MATTEI: I'll offer it, Your Honor.

21 ATTY. PATTIS: No objection, Judge.

22 THE COURT: So ordered.

23 ATTY. MATTEI: Now, Ms. Seshadri, could you  
24 please pull up -- well, just pull up the main  
25 exhibits so the jury can see them. All right.

26 BY ATTY. MATTEI:

27 Q And actually, this -- there were some exhibits -- I'm

1   sorry, some sales reports that were produced year by year.  
2   But Infowarsshop.com was produced for all the years that it  
3   had data for, according to Infowars. Correct?

4       A    Right.

5       Q    All right. And so, what we're seeing here is -- this  
6   is row one, right? According to this sheet, on May 25,  
7   2010, that's the first date for which we have set for, which  
8   Infowars provided data. Correct?

9       A    That's what this says, yes.

10      Q    All right. We'll deal with the rest of it later.

11                ATTY. MATTEI: Why don't we go down to September  
12                2014. Here we go.

13      BY ATTY. MATTEI:

14      Q    I'm going to start with you on September 20 -- well,  
15   let's just look at the few days before, starting September  
16   19, okay?

17      A    I see it.

18      Q    On September 19, you'd agree with me that Infowars  
19   reported 60,000 in daily sales, yes, on -- just on this  
20   website, yes?

21      A    That's what it says, yes?

22      Q    On the next day it was 43,000, just on this website,  
23   yes?

24      A    Yes.

25      Q    On September 21st it was 45,000.

26      A    That's what it says, yes.

27      Q    On September 22nd , it was 62,000.



1 A Yes.

2 Q On September 23rd, it was 56,000.

3 A Yes.

4 Q On September 24th -- this is the date the article was  
5 published, yes?

6 A The 24th, yes.

7 Q -- was 48,000, right?

8 A That's what it says, yes.

9 Q The article then -- And you recall that on September  
10 24 is when the social media was still on a minority  
11 percentage of the overall traffic, right?

12 A I do remember that, yes.

13 Q On September 24, the revenue over this platform was  
14 for 48,000 to 232,000 dollars in the day, right?

15 A Yes, that's what it says.

16 Q Okay. That's like a 500 percent increase?

17 A My math is terrible. So, I don't know the  
18 percentage.

19 Q Okay. And the next day -- and the next day we saw  
20 data, social media, on the 25th, and the 26th had jumped to  
21 first place referral source for revenue, right -- I'm sorry,  
22 referral source for website traffic.

23 A I recall that, yes.

24 Q Right. And it's ebbing off a little bit, but it goes  
25 from 232 -- from 232,000 to 128,000, right?

26 A Yes, that's what it says.

27 Q It's still twice -- more than twice what it was on

1 September 23rd, right?

2 A It is more, yes.

3 Q And then it starts to drop off again. Correct?

4 A That's what it looks like, yes.

5 Q Okay.

6 THE COURT: Attorney Mattei, we're approaching  
7 the lunch hour. So, when it's --

8 ATTY. MATTEI: Your hour, this will be a perfect  
9 time.

10 THE COURT: All right.

11 ATTY. MATTEI: Oh, wait -- Let me just ask one  
12 more question.

13 THE COURT: You may.

14 BY ATTY. MATTEI:

15 Q Ms. Paz, now having seen all of those analytics, is  
16 it still Free Speech Systems' testimony to this jury that it  
17 just doesn't know if it uses them?

18 A It uses what, Google Analytics?

19 Q Yes, ma'am.

20 A The same answer: yes.

21 ATTY. MATTEI: Thank you, Your Honor.

22 THE COURT: So, we'll take the lunch recess.  
23 We'll be back to -- If you could get back by five of  
24 two, so that we can promptly start at 2 p.m.

25 Ron, you know the routine now, we'll collect the  
26 notepads. He'll keep them secure. I don't want to  
27 just keep saying the same thing over and over again,

1 but if you are going to leave the building to enjoy  
2 the nice weather, just make sure you stay clear of  
3 the witnesses and the lawyers and the media, all  
4 right. And I hope you all have a nice lunch.

5 I am going to stay on the record to address  
6 something with counsel. So, have a nice lunch.

7 (The jury was escorted out of the courtroom.)

8 THE WITNESS: May I leave?

9 THE COURT: You may.

10 THE WITNESS: Thank you.

11 THE COURT: Just watch your step.

12 (The witness was excused.)

13 THE COURT: I'll see you on a sidebar, counsel,  
14 all of you.

15 (Begin sidebar.)

16 THE COURT: So, you know how I have to keep  
17 reminding Attorney Pattis to stand during objections  
18 -- and you're doing an admiral -- admirable job.

19 ATTY. PATTIS: I missed a couple, I'm sorry.

20 THE COURT: Well, you did better. Your work  
21 (indiscernible) is better. You put me on the spot.  
22 I don't -- I don't want to see the witness's back.  
23 It's -- I -- I don't want to say it --

24 ATTY. KOSKOFF: I'm so sorry. You told me that  
25 yesterday. I'm so sorry.

26 THE COURT: Well, you asked -- and you asked,  
27 and I didn't want to -- but then I saw your back and

1 I couldn't see what you were doing, you were doing  
2 it, and I don't want you near the corner --

3 ATTY. KOSKOFF: (indiscernible) your screens  
4 here, I'm sorry.

5 THE COURT: And I don't want -- No, I just can't  
6 see that far. I mean, you were turned, and you were  
7 blocking the screen anyway. Now -- I mean, I just  
8 don't want any one in that area. I just feel like --  
9 it just -- there's no --

10 ATTY. KOSKOFF: Understood.

11 THE COURT: -- thing.

12 ATTY. PATTIS: Yeah.

13 ATTY. KOSKOFF: Understood.

14 THE COURT: So, the jury -- I just want to give  
15 them more space, that's all. All right?

16 ATTY. KOSKOFF: Yep. Understood. I forgot that  
17 and --

18 ATTY. MATTEI: Judge --

19 THE COURT: Well, you did ask, and I said yes  
20 because --

21 ATTY. MATTEI: -- can I get some advisory  
22 opinion --

23 ATTY. KOSKOFF: He's going to ask you about the  
24 slip there, aren't you?

25 ATTY. MATTEI: No, no, I'm not. I'm an  
26 (indiscernible)

27 THE COURT: Can you hear Attorney Pattis?

1           ATTY MATTEI: No, I think it's just about where  
2 we're supposed to stand --

3           THE COURT: About what?

4           ATTY. KOSKOFF: It's about the courtroom, where  
5 things are. So, if we're going to use a screen with  
6 a witness, like a big screen, that's so the jury can  
7 see it, for example, to show documents to the --

8           THE COURT: I have my own screen. I'm not sure  
9 where to stand.

10          ATTY. KOSKOFF: Okay.

11          THE COURT: Just not there, because it's too --  
12 it's --

13          ATTY. KOSKOFF: But where should we put the  
14 screen?

15          THE COURT: Wherever you all agree.

16          ATTY. KOSKOFF: Because if we put it there, you  
17 cannot get close to the jury.

18          THE COURT: But I don't want --

19          ATTY. MATTEI: Can I roll the screen around  
20 here?

21          THE COURT: Why don't you guys talk about it --

22          ATTY. KOSKOFF: Okay. We'll figure it out.

23          THE COURT: Just make a -- I think Ron was  
24 concerned that the screen was blocking Attorney  
25 Pattis.

26          ATTY. KOSKOFF: Okay. And, also -- we're all --  
27 we're -- Well, then we'll talk about it -- well,

1 we'll convene, but I still have the question about --

2 THE COURT: So, you guys talk about that,

3 because I know where they've have had --

4 (indiscernible) \*\* 12:59:03 because he thought it was

5 blocking the defense team.

6 ATTY. KOSKOFF: Well, he --

7 THE COURT: So, I know it's hard --

8 ATTY. KOSKOFF: Well, he -- I know, Judge, you

9 don't -- Judge, you don't want Chris or me on that

10 side of the screen either.

11 THE COURT: Hmm?

12 ATTY. KOSKOFF: You don't want us in that

13 corner.

14 ATTY. MATTEI: Right.

15 THE COURT: I don't because I cannot have the

16 witnesses back to --

17 ATTY. PATTIS: That's fine.

18 THE COURT: -- it just --

19 ATTY. PATTIS: Yeah, Judge, understand. Try to

20 work on it.

21 THE COURT: -- she -- she is marking that case,

22 just so you know. I guess she was down in the jury

23 --

24 ATTY. PATTIS: Yeah, yeah. I told her --

25 ATTY. MATTEI: I think I got it, Your Honor.

26 ATTY. PATTIS: By the way, just while I have

27 your attention, the -- we cannot -- the microphone is

1           picking up --

2           THE COURT: Cover the attorney --

3           ATTY. PATTIS: -- we can't even (indiscernible)  
4           whisper -- we talked about turning off the table  
5           mics.

6           THE COURT: Let me talk to Ron and see if they  
7           can be --

8           ATTY. KOSKOFF: Okay.

9           ATTY. PATTIS: I would prefer that too, it's all  
10          plugged in.

11          THE COURT: Right.

12          ATTY. PATTIS: See, whether it's going to be a  
13          hot mic --

14          THE COURT: Can't you put your hand on it? I  
15          mean --

16          ATTY. PATTIS: I've worked at that and it's not  
17          --

18          THE COURT: Well, not here, because I want to be  
19          on record, but yours -- when you're --

20          ATTY. PATTIS: It's really hard to --

21          ATTY. KOSKOFF: It makes a lot of noise when you  
22          touch it.

23          ATTY. PATTIS: And the other thing too, is  
24          things happen in the moment --

25          ATTY. KOSKOFF: Yeah, you might react --

26          ATTY. PATTIS: -- you know, what I mean?

27          THE COURT: What if we turn them off --





DOCKET NO: UWY-CV18-6046436-S : SUPERIOR COURT  
ERICA V. LAFFERTY, ET AL : JUDICIAL DISTRICT  
OF WATERBURY  
v. : AT WATERBURY, CONNECTICUT  
ALEX EMRIC JONES, ET AL : SEPTEMBER 15, 2022

---

DOCKET NO: UWY-CV18-6046437-S : SUPERIOR COURT  
UWY-CV18-6046438-S :  
WILLIAM SHERLACH : JUDICIAL DISTRICT  
OF WATERBURY  
v. : AT WATERBURY, CONNECTICUT  
ALEX EMRIC JONES : SEPTEMBER 15, 2022

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C E R T I F I C A T I O N

I hereby certify that the foregoing pages are a true and correct transcription of the audio recording of the above-referenced case, heard in Superior Court, Judicial District of Waterbury, Waterbury, Connecticut, before the Honorable Barbara N. Bellis, Judge, on the 15th day of September, 2022.

Dated this 16th day of September, 2022, in Waterbury, Connecticut.

  
Janet M. Orozco  
Court Transcribing Monitor

DOCKET NO: UWY-CV18-6046436-S : SUPERIOR COURT  
ERICA V. LAFFERTY, ET AL : JUDICIAL DISTRICT  
OF WATERBURY  
v. : AT WATERBURY, CONNECTICUT  
ALEX EMRIC JONES, ET AL : SEPTEMBER 15, 2022

---

DOCKET NO: UWY-CV18-6046437-S : SUPERIOR COURT  
UWY-CV18-6046438-S :  
WILLIAM SHERLACH : JUDICIAL DISTRICT  
OF WATERBURY  
v. : AT WATERBURY, CONNECTICUT  
ALEX EMRIC JONES : SEPTEMBER 15, 2022

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E L E C T R O N I C C E R T I F I C A T I O N

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Janet M. Orozco  
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Court Recording Monitor